

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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WCA HOLDINGS III, LLC,

Plaintiff,

-against-

PANASONIC AVIONICS CORPORATION,

Defendant.
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Case No. 1:20-cv-7472 (GHW)

**NOTICE OF MOTION TO DISMISS
THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and Declaration of Wanda D. French-Brown, dated December 15, 2020, and all other prior proceedings held herein, Defendant Panasonic Avionics Corporation, by its attorneys, Loeb & Loeb LLP, will move this Court at the United States Courthouse located at the Daniel Patrick Moynihan, United States Courthouse, 500 Pearl St. New York, NY 10007-1312, before the Honorable Gregory H. Woods, as soon as counsel can be heard, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Amended Complaint of Plaintiff WCA Holdings III, LLC on the ground that the Amended Complaint fails to state a claim upon which relief can be granted, as to Count I with respect to the eX1 system, and Counts II and III, in their entirety, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York
December 15, 2020

LOEB & LOEB LLP

By: /s/ Wanda D. French-Brown
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